

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ALBERT BROWN

PLAINTIFF

VS.

CIVIL ACTION NO. 3:16cv00651-WHB-JC

**MITCH ADCOCK, IN HIS INDIVIDUAL
AND OFFICIAL CAPACITIES,
MARY CURRIER, IN HER INDIVIDUAL
AND OFFICIAL CAPACITIES, AND
MISSISSIPPI DEPARTMENT OF HEALTH**

DEFENDANTS

RESPONSE TO ORDER TO SHOW CAUSE

1. Undersigned counsel filed this employment discrimination matter on or about August 23, 2016. The defendants filed an Answer on or about December 21, 2016. This Court, thereafter, scheduled a Case Management Conference at 10:30 a.m. on Tuesday, January 17, 2017.

2. Undersigned counsel is a public defender in Madison County, Mississippi. Undersigned counsel had several cases on the docket in Madison County Circuit Court in Canton, Mississippi on Tuesday, January 17, 2017. A copy of the Court's docket is attached hereto as Exhibit A. In addition to the case of Vintress Lemar Sutherland, which is listed on Exhibit A, undersigned counsel also appeared before the Circuit Court on all of the cases listed on Exhibit B, Circuit Court Cases for Lisa Ross, except the case of Justin Dale Johnson, who hired private counsel prior to January 23, 2017. For your Honor's reviewed, undersigned counsel has attached copies of the scheduling orders for the other individuals she represented before the Madison County Circuit Court on Tuesday, January 23, 2017. *See*, Exhibit C.

3. Undersigned counsel planned to participate in the Case Management Conference at the scheduled time from the Madison County Courthouse. While attending to other matters in Circuit Court, undersigned counsel lost track of time and missed the Case Management Conference that was scheduled by the court.
4. Undersigned counsel's conduct was unintentional and was not done for the purpose of harassment or delay. When undersigned counsel discovered that she missed the Case Management Conference, undersigned counsel called your Honor's chambers. Your Honor had moved to the court's next scheduled case.
5. Undersigned counsel prays that this Court will accept her explanation for missing the Case Management Conference. Undersigned counsel also seeks such other and further relief as the Court and Jury may deem just and proper under the circumstances as hereinabove set forth.

RESPECTFULLY SUBMITTED this, the 23rd day of January, 2017.

ALBERT BROWN

By: /s/ Lisa M. Ross
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CERTIFICATE OF SERVICE

I, Lisa M. Ross, hereby certify that a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by electronic mail to all parties by the Court's electronic filing system. Parties may access this filing through the Court's ECF System.

SO CERTIFIED, this the 23rd day of January, 2017.

/s/ Lisa M. Ross